

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
EASTERN DIVISION

<p>CHARLEE LANG; GREGORY LANG on behalf of minor daughter J.L.;</p> <p style="text-align: center;"><i>Plaintiffs,</i></p> <p>v.</p> <p>OAK GROVE LUTHERAN SCHOOL, through its Board of Regents; DANIEL STOA, in his official and individual capacity; MICHAEL SLETTE, in his official and individual capacity; BRENT WOLF, in his official and individual capacity; AMIEE ZACHIRSON, in her official and individual capacity,</p> <p style="text-align: center;"><i>Defendants.</i></p>	<p style="text-align: center;">Case No. 3:23-cv-00019-ARS</p> <p style="text-align: center;"><b>MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT DANIEL STOA’S MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS’ AMENDED COMPLAINT AND REQUEST FOR EXPEDITED DECISION</b></p>
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Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and other applicable law, Defendant Daniel Stoa requests the Court extend the current May 31, 2023 deadline to respond to Plaintiffs’ Amended Complaint (Doc. ID#28) until June 14, 2023.

Good cause exists for the requested extension of time. First, much like the Oak Grove Defendants, Defendant Stoa intends to file a Rule 12(b)(6) Motion requesting dismissal of the Amended Complaint for failure to state a claim. Second, Attorney Shawn Grinolds, on behalf of the Defendants, requested a time extension from Plaintiffs’ counsel and Plaintiffs’ counsel did not object to the requested time extension. Finally, this Court has already granted the unopposed Motion of Oak Grove Defendants.

As the current deadline for Defendant Stoa’s response to Plaintiffs’ Amended Complaint is May 31, 2023, Defendant Stoa requests an expedited decision on this Motion.

Therefore, Defendant Stoa requests the Court to extend the deadline for his response to Plaintiffs’ Amended Complaint until June 14, 2023.

Dated this 30<sup>th</sup> day of May, 2023.

/s/ William P. Harrie

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT DANIEL STOA'S MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' AMENDED COMPLAINT AND REQUEST FOR EXPEDITED DECISION** was on the 30<sup>th</sup> day of May, 2023, was filed electronically with the Clerk of Court through ECF.

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